

1 **RESNICK & LOUIS, P.C.**
2 CARISSA YUHAS, ESQ.
3 Nevada Bar No. 14692
4 cyuhas@rlattorneys.com
5 8945 West Russell Road, Suite 330
6 Las Vegas, Nevada 89148
7 Telephone: (702) 997-3800
8 Facsimile: (702) 997-3800
9 *Attorney for Defendant,*
10 *LOVE'S TRAVEL STOPS &*
11 *COUNTRY STORES, INC.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SHEILA MILLER, individually,

15 Plaintiff,

16 vs.

17 LOVE'S TRAVEL STOPS & COUNTRY
18 STORES, INC., an Oklahoma Corporation;
19 GRANT THORNTON, LLP, a Foreign
20 Limited-Liability Partnership; and DOES I-X;
21 and ROE BUSINESS ENTITIES XI-XX,
22 inclusive.

23 Defendants

CASE NO.: 2:24-cv-02410

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISCOVERY
DEADLINES**

(THIRD REQUEST)

24 IT IS HEREBY STIPULATED by and between Plaintiff, SHEILA MILLER, through her
25 attorney, KIRILL V. MIKHAYLOV, ESQ., of PACIFIC WEST INJURY LAW, and Defendant,
26 LOVE'S TRAVEL STOPS & COUNTRY STORES, INC., through their attorney, CARISSA
27 YUHAS, ESQ. of RESNICK & LOUIS, P.C., that good cause existing and pursuant to Local Rule
28 26-1(b), discovery in this matter shall be extended an additional sixty (60) days for the purpose of
completing the discovery described herein.

I. DISCOVERY WHICH HAS BEEN COMPLETED

1. The parties have conducted the FRCP 26.1 Early Case Conference.

1 2. Plaintiff has produced her Lists of Witnesses and Documents, and supplements
2 thereto pursuant to FRCP 26(a).

3 3. Defendant has produced its Lists of Witnesses and Documents, and supplements
4 thereto pursuant to FRCP 26(a).

5 4. Defendant propounded First Set of Interrogatories to Plaintiff.

6 5. Defendant propounded First Set of Requests for Production to Plaintiff.

7 6. Defendant propounded First Set of Request for Admissions to Plaintiff.

8 7. Plaintiff served Responses to Defendant's First Set of Interrogatories.

9 8. Plaintiff served Responses to Defendant's First Set of Requests for Production.

10 9. Plaintiff served Responses to Defendant's First Set of Request for Admissions.

11 10. Plaintiff propounded First Set of Interrogatories to Defendant.

12 11. Plaintiff propounded First Set of Requests for Production to Defendant.

13 12. Plaintiff propounded First Set of Request for Admissions to Defendant.

14 13. Defendant served Responses to Plaintiff's First Set of Interrogatories.

15 14. Defendant served Responses to Plaintiff's First Set of Requests for Production.

16 15. Defendant served Responses to Plaintiff's First Set of Request for Admissions.

17 16. The parties conducted Plaintiff's deposition.

18 17. Defendant served its Initial Disclosure of Expert Witnesses and supplements
19 thereto pursuant to FRCP 26(a).

20 18. Plaintiff served her Initial Disclosure of Expert Witnesses.

21 **II. DISCOVERY THAT REMAINS TO BE COMPLETED**

22 1. Deposition of Defendant Love's Travel Stops & Country Stores, Inc. 30(b)(6)
23 witness(es) (the parties are currently coordinating)

24 2. Potential NRCP 35 exam of Plaintiff (currently pending information from
25 Plaintiff's updated treatment records);

26 3. Depositions of Plaintiff's treating physician(s);
27
28

1 Lastly, the parties are in the process of scheduling the deposition of Defendant's 30(b)(6)
 2 witness. The parties have been working together with lengthy discussions to reach agreeable
 3 terms for the deposition in order to avoid Court intervention and require additional time to prepare
 4 the witness and schedule the deposition.

5 This Request for an extension of time is not sought for any improper purpose other
 6 purpose of delay. Despite both parties' efforts, they have been precluded from fully investigating
 7 the merits of this case through necessary discovery. Based on the foregoing, both Plaintiff and
 8 Defense counsel are requesting that the discovery deadlines be extended by sixty (60) days.

9 **V. MODIFICATION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	April 22, 2025	Closed
Initial Expert Disclosures	June 23, 2025	Closed
All Rebuttal Expert Disclosures	July 21, 2025	Closed
Discovery Cut-Off Date	October 20, 2025	December 19, 2025
Dispositive Motions	November 18, 2025	January 20, 2026

15 The parties represent this Stipulation is sought in good faith and not interposed for delay
 16 or any other improper purpose.

17 DATED this 6th day of October, 2025.

18 PACIFIC WEST INJURY LAW

19 /s/ Kirill V. Mikhaylov

21 KRISTOPHER M. HELMICK, ESQ.

Nevada Bar No. 13348

22 KIRILL V. MIKHAYLOV, ESQ.

Nevada Bar No. 13538

23 BOHDEN G. COLE, ESQ.

Nevada Bar No. 15719

24 8180 Rafael Rivera Way #200

Las Vegas, NV 89113

25 *Attorneys for Plaintiff*

DATED this 6th day of October, 2025.

RESNICK & LOUIS, P.C.

/s/Carissa Yuhas

CARISSA YUHAS, ESQ.

Nevada Bar No. 14692

8945 W. Russell Road, Suite 330

Las Vegas, NV 89148

Attorney for Defendant

LOVE'S TRAVEL STOPS &

COUNTRY STORES, INC

IT IS SO ORDERED

DATED: 8:42 pm, October 07, 2025

4 **BRENDA WEKSLER**
UNITED STATES MAGISTRATE JUDGE